Being called for British military service, he claimed exemption under section 8 of the Military Service Act, 1916 as a person who had been "a prisoner of war, captured or interned by the enemy, and [had] been released." *Held,* that he was exempt from service. *King v. Burnham* (1918, K. B.) 119 L. T. Rep. 308.

It required a liberal construction, believed, however, to be correct, to hold that notwithstanding the freedom of movement allowed the appellant, the prohibition to leave Hamburg constituted an "internment" of a civilian prisoner. In a previous case, temporary detention pending inquiry as to whether a British subject should be kept in Germany as a prisoner of war was held not to constitute "internment." *Robinson v. Metcalf* (1917, K. B.) 33 Times L. R. 542. The sanctity given by the court to appellant's oath to Germany speaks well for the character of Bristish justice. See also Hall, *Int. Law* (7th ed.) 432.

CONSTITUTIONAL LAW—FULL FAITH AND CREDIT—VALIDITY OF SERVICE ON FORMER AGENT OF NON-RESIDENT.—An action was brought in Illinois upon a judgment for money rendered by a Kentucky court. The transactions upon which the Kentucky judgment was based took place in that state. At the time the defendants were residing in another state and carried on business in Kentucky through a resident who on their behalf entered into the transaction in question. The agency was terminated before the Kentucky suit was brought. Under the Kentucky statute process was served upon the former agent. No other service was had upon the defendants, who were still non-residents. *Held,* that the Kentucky judgment was void and so not entitled to recognition by the Illinois court. *Flexner v. Farson, Jr. et al.* (1919) 39 Sup. Ct. 97.

Under prevailing notions as to state jurisdiction the result is sound. The court argued that as the state had no power to exclude the defendants from doing business in the state, it could not require as a condition of letting them in that they assent to service on the former agent, as it might have done in the case of a corporation chartered by another state. *New York Life Ins Co. v. Dunlevy* (1915) 241 U. S. 518, 36 Sup. Ct. 613; *Mutual Reserve Fund Life Ass'n v. Phelps* (1903) 190 U. S. 147, 23 Sup. Ct. 707. The law as to the state's power to exclude the foreign corporation seems, however, to be in a transition period. Henderson, *The Position of Foreign Corporations in American Constitutional Law,* reviewed *infra.* The principal case, however, calls attention to a serious evil, viz., that the courts of the state in which the transaction took place have no power at present to compel the non-resident who acts through an agent to submit to their adjudication of controversies arising out of transactions carried on in the state. Such a result suggests the desirability of a law permitting the service throughout the country of such process in appropriate cases. See the article by Professor Cook, *The Powers of Congress under the Full Faith and Credit Clause, supra,* p. 421.

CONSTITUTIONAL LAW—POLICE POWER—STATUTE REGULATING INGREDIENTS OF CONDENSED MILK.—An Ohio statute prohibited under penalty the sale of condensed milk unless made from milk "from which the cream had not been removed and in which the proportion of milk solids" equalled a prescribed percentage. The plaintiff manufactured and sold "Hebe," a pure product of "skimmed milk condensed by evaporation" to which cocoanut oil to the extent of six per cent was added. The label plainly indicated the ingredients. The plaintiff brought a bill to restrain threatened prosecutions. *Held,* that the plaintiff was not entitled to relief, as the statute was valid and the plaintiff's product fell within it. Day, Van Devanter, and Brandeis, JJ., *dissenting. Hebe Co. and Carnation Milk Products Co. v. Shaw* (1919) 39 Sup. Ct. 125.